

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for a limited proceeding to : **DOCKET NO. 20200176-EI**
approve clean energy connection program :
and tariff and stipulation, by Duke Energy :
Florida, LLC. : **Filed: November 5, 2020**

**AMENDED PREHEARING STATEMENT OF
WALMART INC.**

Pursuant to Florida Public Service Commission's ("Commission" or "PSC") Order No. PSC-2020-0324-PCO-EI, issued September 22, 2020, Walmart Inc. ("Walmart") files its Amended Prehearing Statement.

I. WITNESSES

| <u>Witness</u> | <u>Subject</u> | <u>Issue No.</u> |
|-----------------|--|------------------|
| Steve W. Chriss | Mr. Chriss' Oct. 2, 2020, testimony addresses Walmart's support for Duke Energy Florida LLC's ("DEF" or "Company") Clean Energy Connection ("CEC") Program and the Stipulation attached as Exhibit A to DEF's Application. | 1 |

II. EXHIBITS

| <u>Exhibit</u> | <u>Description</u> |
|----------------|---|
| SWC-1 | Witness Qualifications Statement |
| SWC-2 | Stipulation (July 20, 2020, filed in connection with Storm Protection Plan Dockets) |

III. WALMART'S STATEMENT OF BASIC POSITION

Walmart believes it is in the public interest for the Commission to approve DEF's CEC Program and accompanying Tariff and Stipulation filed July 1, 2020. As stated in the Petition, Walmart, Southern Alliance for Clean Energy ("SACE"), and Vote Solar signed a Stipulation with DEF supporting the proposed CEC Program. Walmart believes the CEC Program, as proposed by DEF, is designed to fully and fairly value solar resources, maximize opportunities for participation in the CEC Program -- including opportunities for low income customers, small businesses, and governmental entities -- and bring the lowest cost solar resources to customers over the life of the Program. In fact, 87.3% of the CEC Program's projected savings flow to the general body of DEF customers. As such, the CEC Program and Tariff are in the public interest, and the Stipulation represents a fair, just, and reasonable resolution of issues that otherwise would have been litigated in this Docket.

IV. ISSUES

Issue 1: **Should the Commission approve the Stipulation for approval of the Duke Energy Florida, LLC, Clean Energy Connection Program and Tariff, when taken as a whole, as in the public interest?**

Position: Yes. The Commission should approve the Stipulation, DEF's CEC Program and Tariff, as filed on July 1, 2020, because, when taken as a whole, approval of DEF's CEC Program and Tariff is in the public interest.

Issue 2: **Should this docket be closed?**

Position: Yes, if the Stipulation, Program, and Tariff are approved as submitted on July 1, 2020.

V. PENDING MOTIONS OR OTHER ACTIONABLE MATTERS

Walmart has no pending Motions at this time. However, the League of United Latin American Citizens ("LULAC") served discovery on Walmart, to which Walmart objected, in part. Walmart anticipates that LULAC will file a Motion to Compel and Walmart will file a Motion for Confidential Designation and/or Motion for Protective Order.

VI. PENDING CONFIDENTIALITY REQUESTS OR CLAIMS

On November 3, 2020, Walmart filed a letter sending its Confidential Response to LULAC's First Set of Interrogatories, No. 4, to the PSC and will seek a Confidential Designation as to the same.

VII. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

Walmart does not object to any witness's qualifications as an expert.

VIII. COMPLIANCE WITH ORDER NO. PSC-2020-0324-PCO-EI

There are no requirements of Order No. PSC-2020-0324-PCO-EI with which Walmart cannot comply.

Respectfully submitted,

By /s/ Stephanie U. Eaton

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Dated: November 5, 2020

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail to the following parties this 5th day of November, 2020.

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